



IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

WALTER MCCOWN, as Attorney in Fact for)
SAMMIE MCCOWN,)
Plaintiff,)

JUN 28 2016

vs.)

Case No.

RICK WARREN
COURT CLERK

36

ALLSTATE INSURANCE COMPANY,)
Defendant.)

CJ-2016 - 3263

PETITION

Plaintiff, for his Petition against Defendant, states:

(1) Defendant sold Plaintiff, Sammie McCown, condominium policy, No. 010905294.

While insured under the policy, Plaintiff's condominium was damaged when a pipe broke.

(2) Plaintiff submitted a claim, which Defendant denied, saying she would have to look first for coverage under a policy on the condominium complex. Plaintiff told Defendant that the condominium policy had already told her it would not provide coverage for the claim, yet still Defendant, without so much as sending an adjuster to investigate the claim, denied it outright. Defendant breached the contract, and did so in bad faith, taking advantage of its elderly insured.

WHEREFORE, Plaintiff prays judgment against Defendant for \$11,000 on the contract claim, plus an amount in excess of \$75,000 on the tort claim, and, pursuant to 36 O.S. § 3629, interest at 15%, attorney's fee and costs, and all other appropriate relief.

Respectfully submitted,

Rex Travis

REX TRAVIS, OBA #9081
PAUL KOURI, OBA #20751
JUSTIN C. CLIBURN, OBA #32223
JACOB MASTERS, OBA #32456
info@travislawoffice.com
P.O. Box 1336
Oklahoma City, OK 73101-1336
Telephone: (405) 236-5400
Facsimile: (405) 236-5499
Attorneys for Plaintiff

ATTORNEY'S LIEN CLAIMED